GREENBERG TRAURIG, LLP Attorneys for Perry Partners, L.P. 200 Park Avenue New York, New York 10166 (212) 801-9200 (Tel) (212) 801-6400 (Fax) Bruce R. Zirinsky, Esq.

# UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re:

MOTORS LIQUIDATION COMPANY, et al., f/k/a General Motors Corp., et al.,

Debtor.

Chapter 11

Case No. 09-50026 (REG)

Jointly Administered

## NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that the undersigned hereby appears in this case as attorneys for Perry Partners, L.P. ("Perry") with respect to its claims based upon the £350,000,000 8.375% Guaranteed Notes due December 7, 2015 and the £250,000,000 8.875% Guaranteed Notes due July 10, 2023 issued by General Motors Nova Scotia Finance Company, which Notes are fully and unconditionally guaranteed by Motors Liquidation Company f/k/a General Motors Corporation, and requests as provided in 11 U.S.C. § 1109(b) and Federal Rules of Bankruptcy Procedure 2002, 9007, and 9010(b) (the "Bankruptcy Rules") that all notices given or required to be given, and all papers served or required to be served, be given to and served upon:

GREENBERG TRAURIG, LLP Attorneys for Perry Partners, L.P. 200 Park Avenue New York, New York 10166 (212) 801-9200 (Tel) (212) 801-6400 (Fax) Attn: Bruce R. Zirinsky Nancy A. Mitchell

Allen G. Kadish
Zirinskyb@gtlaw.com
Mitchelln@gtlaw.com
Kadisha@gtlaw.com

PLEASE TAKE FURTHER NOTICE that pursuant to 11 U.S.C. § 1109(b), this request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral, whether transmitted or conveyed by mail, courier service, hand-delivery, telephone, facsimile transmission, telegraph, telex, email, Internet, or otherwise filed or made with regard to the above-captioned case, or that affects or seeks to affect in any way any rights or interests of any party in interest in this case.

**PLEASE TAKE FURTHER NOTICE** that demand is also made that the undersigned be added to the notice list for notice of all contested matters, adversary proceedings, and other proceedings in the referenced chapter 11 cases.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive Perry's: (i) right to have final orders in non-core matters entered only after de novo review by a district judge; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference

withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs or recoupments to which it is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are reserved.

Dated: New York, New York December 3, 2009

GREENBERG TRAURIG, LLP

By: <u>/s/Bruce R. Zirinsky</u>
Bruce R. Zirinsky
200 Park Avenue
New York, New York 10166
(212) 801-9200 (Tel)
(212) 801-6400 (Fax)
Zirinskyb@gtlaw.com

Attorneys for Perry Partners, L.P.

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**CERTIFICATE OF SERVICE** 

The undersigned, an attorney admitted to practice before this Court, hereby

certifies that a true and correct copy of the pre-fixed Notice of Appearance

and Request for Service of Papers was served on December 3, 2009, by regular mail

upon the parties listed on the attached Exhibit A, and by electronic mail upon the parties

listed on the attached Exhibit B.

Dated: N

New York, New York

December 3, 2009

/s/ Michele Angell

Michele Angell

### **EXHIBIT A**

#### **CORE MASTER SERVICE LIST**

WEIL, GOTSHAL & MANGES LLP ATTORNEYS FOR THE DEBTORS 767 FIFTH AVENUE NEW YORK, NEW YORK 10153 (ATTN: HARVEY R. MILLER, ESQ., STEPHEN KAROTKIN, ESQ., AND JOSEPH H. SMOLINSKY, ESQ.)

MOTORS LIQUIDATION COMPANY 300 RENAISSANCE CENTER DETROIT, MICHIGAN 8265 (ATTN: TED STENGER)

GENERAL MOTORS COMPANY 300 RENAISSANCE CENTER DETROIT, MICHIGAN 48265 (ATTN: LAWRENCE S. BUONOMO, ESQ.)

CADWALADER, WICKERSHAM & TAFT LLP ATTORNEYS FOR THE UNITED STATES DEPARTMENT OF THE TREASURY ONE WORLD FINANCIAL CENTER NEW YORK, NEW YORK 10281 (ATTN: JOHN J. RAPISARDI, ESQ.)

UNITED STATES DEPARTMENT OF THE TREASURY 1500 PENNSYLVANIA AVENUE NW, ROOM 2312, WASHINGTON, D.C. 20220 (ATTN: MATTHEW FELDMAN, ESQ.)

VEDDER PRICE, P.C.
ATTORNEYS FOR EXPORT DEVELOPMENT CANADA
1633 BROADWAY, 47TH FLOOR
NEW YORK, NEW YORK 10019
(ATTN: MICHAEL J. EDELMAN, ESQ. AND MICHAEL L. SCHEIN, ESQ.)

KRAMER LEVIN NAFTALIS & FRANKEL LLP
ATTORNEYS FOR THE STATUTORY COMMITTEE
OF UNSECURED CREDITORS
1177 AVENUE OF THE AMERICAS
NEW YORK, NEW YORK 10036
(ATTN: KENNETH H. ECKSTEIN, ESQ., THOMAS MOERS MAYER, ESQ.,
ADAM C. ROGOFF, ESQ., AND GORDON Z. NOVOD, ESQ.)

OFFICE OF THE UNITED STATES TRUSTEE FOR THE SOUTHERN DISTRICT OF NEW YORK 33 WHITEHALL STREET, 21ST FLOOR NEW YORK, NEW YORK 10004 (ATTN: DIANA G. ADAMS, ESQ.)

U.S. ATTORNEY'S OFFICE, S.D.N.Y.
86 CHAMBERS STREET, THIRD FLOOR
NEW YORK, NEW YORK 10007
(ATTN: DAVID S. JONES, ESQ. AND MATTHEW L. SCHWARTZ, ESQ.)

#### IN LIEU OF ELECTRONIC MAIL

ATLAS OIL COMPANY 124501 ECORSE ROAD TAYLOR, MI 48180

BOB HASTINGS BUICK GMC, INC. ATT: DAVID P. STOETZEL 800 PANORAMA TRAIL SOUTH ROCHESTER, NY 14625

CHARLES CLARK CHEVROLET CO. P.O. BOX 520 MCALLEN, TX 78505

DANIEL W. SHERRICK, GENERAL COUNSEL 8000 EAST JEFFERSON AVE DETROIT, MI 48214

DAVID V. COOKE, ASSISTANT CITY ATTORNEY MUNICIPAL OPERATIONS 201 WEST COLFAX AVENUE, DEPT. 1207 DENVER, CO 80202

DORSEY & WHITNEY LLP ATTN: MICHAEL FOREMAN, ESQ. ATTY FOR BALLARD MATERIAL PRODUCTS INC. 250 PARK AVENUE NEW YORK, NY 10177

EATON CORPORATION 1111 SUPERIOR AVENUE CLEVELAND, OH 44114

EDWARD S. DONINI, ESQ. P.O. BOX 605 NEW SMFRNA BEACH, FL 32170

EL PASO CORPORATION ATT: MICHAEL J. MCGINNIS, SENIOR ATTORNEY 1001 LOUISIANA, SUITE E 1943 A HOUSTON, TX 77002

ELLIAS GROUP LLC ATT: DAN ELLIAS 411 THEODORE FREMD AVENUE, SUITE 102 RYE, NY 10580

FACTORY MOTOR PARTS COMPANY 1380 CORPORATE CENTER CURVE EAGAN, MN 55121

GHSP, INC. ATTN: RON WALLISH 1250 SOUTH BEECHTREE STREET GRAND HAVEN, MI 49417 HOWARD COUNTY OFFICE OF LAW ATT: CAMELA J. SANDMANT, ASSISTANT COUNTY SOLICITOR GEORGE HOWARD BUILDING 3430 COURTHOUSE DRIVE ELLICOTT CITY, MD 21043

IMPERICAL COUNTY TREASURER-TAX COLLECTOR KAREN VOGEL, TREASURER TAX COLLECTOR 940 WEST MAIN STREET, SUITE 106 EL CENTRO, CA 92243

INTERNAL REVENUE SERVICE ATTN: INSOLVENCY SECTION 290 BROADWAY NEW YORK, NY 10007

INTERNAL REVENUE SERVICE ATTN: INSOLVENCY SECTION P.O. BOX 21126 PHILADELPHIA, PA 19114

JIM BARNARD CHEVROLET, INC. ATT: ALLYN BARNARD, PRESIDENT 7107 BUFFALO ROAD CHURCHVILLE, NY 14428

KNAPP CHEVROLET 815 HOUSTON AVENUE HOUSTON, TX 77007

MADISON COUNTY, TAX COLLECTOR ATT: LYNDA HALL MADISON COUNTY COURT HOUSE 100 NORTHSIDE SQUARE HUNTSVILLE, AL 35801

MELTZER, PURTILL & STELLE, LLC ATT: FORREST B. LAMMIMAN ATTY FOR BROADWAY IN CHICAGO LLC 300 SOUTH WACKER DRIVE, SUITE 3500 CHICAGO, IL 60606

MIKE BARNARD CHEVROLET-CADILLAC-BUICK-PONTIAC-GMC, INC. ATT: MICHAEL E. BARNARD, PRESIDENT 616 THAYER ROAD FAIRPORT, NY 14450

NEW YORK STATE DEPT TAXATION & FINANCE ATTN: BANKRUPTCY/SPECIAL PROC. SECT. PO BOX 5300 ALBANY, NY 12205

P. RICHARD HARTLEY 415 E. COMMERCE STREET, SUITE 101 POST OFFICE BOX 583 GREENVILLE, AL 36037

PADDOCK CHEVROLET, INC. ATT: DUANE PADDOCK, PRESIDENT 3232 DELAWARE AVENUE KENMORE, NY 14217 PENSKE AUTO GROUP 18600 SOUTH HAWTHORNE BOULEVARD TORRANCE, CA 90504

PYEONG HWA AUTOMOTIVE CO., LTD. 1032 DAECHEON-DONG DALSEO-GU, KR 704-801

R. ELPING, K. DINE & E. CARRIG 1540 BROADWAY NEW YORK, NY 11036

SATURN OF ROCHESTER, INC. ATT: DAVID P. STOETZEL 770 PANORAMA TRAIL SOUTH P.O. BOX 25427 ROCHESTER, NY 14625

SECURITIES AND EXCHANGE COMMISSION ATTN: ANDREW N. VOLLMER, ACTING GEN. COUNSEL 100 F STREET, ND WASHINGTON, DC 20549

SHAPE CORP. ATTN: BUDD BRINK 1900 HAYES STREET GRAND HAVEN, MI 49417

TEAM CHEVROLET, INC. ATT: THOMAS STEIGERWALD, VICE PRESIDENT ROUTE 16 OLEAN, NY 14760

THE VALLEY CADILLAC CORPORATION ATT: EDWARD T. MEAGHAR, JR., PRESIDENT 3100 WINTON ROAD SOUTH ROCHESTER, NY 14623

TORRES EDWARD ZUNIGA BERMUDEZ, GENOVEVA C/O COHEN & ASSOCIATES 8710 E Vista Bonita Dr SCOTTSDALE, AZ 85255

TOYOTA BOSHOKU AMERICA, INC. 28000 WEST PARK DRIVE NOVI, MI 48377

TOYOTA MOTOR SALES U.S.A, INC. ATT: TOBIN LIPPERT 19001 SOUTH WESTERN AVE, HQ12 TORRANCE, CA 90509

UNITED STATES ATTORNEY'S OFFICE ATTN: CLAIMS UNIT - ROOM 417 ONE ST. ANDREWS PLAZA NEW YORK, NY 10007 EDS, AN HP COMPANY ATT: AYALA HASSELL BANKRUPTCY & INSOLVENCY, SENIOR ATTORNEY H3-3A-05, 5400 LEGACY DRIVE PLANO, TX 75024

HEWLETT-PACKARD COMPANY LP ATT: RAMONA NEAL, SENIOR COUNSEL 11311 CHINDEN BOULEVARD MAIL STOP 314 BOISE, ID 83714

HEWLETT-PACKARD FINANCIAL SERVICES COMPANY ATT: LINDA D'AMICO 420 MOUNTAIN AVENUE MURRAY HILL, NJ 07640

## Exhibit B

steve.keller@affiniagroup.com; blc@ashrlaw.com; david.boyle@airgas.com; dfish@allardfishpc.com; cwoodruffneer@alpine-usa.com; elizabeth.spangler@arcadis-us.com; giaimo.christopher@arentfox.com; rothleder.jeffrey@arentfox.com; campbell.andrea@arentfox.com; sullivan.james@arentfox.com; dowd.mary@arentfox.com; dgoing@armstrongteasdale.com; dladdin@agg.com; frank.white@agg.com; jg5786@att.com; hwangr@michigan.gov; leslie.levy@nebraska.gov; bk-mbrowning@oag.state.tx.us; victoria.garry@ohioattorneygeneral.gov; raterinkd@michigan.gov; bk-kwalsh@oag.state.tx.us; przekopshaws@michigan.gov; neal.mann@oag.state.ny.us; jhutchinson@bakerlaw.com; egoodman@bakerlaw.com; wgibson@bakerlaw.com; rbernard@bakerlaw.com; wgibson@bakerlaw.com; summersm@ballardspahr.com; jgregg@btlaw.com; mark.owens@btlaw.com; rcpottinger@bslbv.com; ffm@bostonbusinesslaw.com; kurt.bock@basf.com; csalomon@beckerglynn.com; aspector@bergersingerman.com; patrick@bbslaw.com; tom@bbslaw.com; robert.dombroff@bingham.com; jeffrey.sabin@bingham.com; anna.boelitz@bingham.com; jonathan.alter@bingham.com; mrichards@blankrome.com; kelbon@blankrome.com; jrumley@bcbsm.com; cdarke@bodmanllp.com; mbakst@bodmanllp.com; borgeslawfirm@aol.com; renee.dailey@bgllp.com; bankruptcy.asbpo.asbdom@braytonlaw.com; jmcdonald@briggs.com; wilkins@bwst-law.com; hall@bwst-law.com; kschweiker@brownconnery.com; rbrown@brownwhalen.com; schristianson@buchalter.com; peter.lee@bnsf.com; ccarson@burr.com; jkimble@burr.com; paige@bsplaw.com; sidorsky@butzel.com; fishere@butzel.com; sidorsky@butzel.com; fishere@butzel.com; radom@butzel.com; newman@butzel.com; cbblac@acxiom.com; john.rapisardi@cwt.com; douglas.mintz@cwt.com; peter.friedman@cwt.com; zachary.smith@cwt.com; rfiga@comlawone.com; rweinstein@cusa.canon.com; ei@capdale.com; pvnl@capdale.com; rer@capdale.com; tws@capdale.com; brcy@carsonfischer.com; brcy@carsonfischer.com; brcy@carsonfischer.com; mweinczok@casselsbrock.com; alan@chapellassociates.com; lcrichardson@chemicosystems.com; ccahill@clarkhill.com; rgordon@clarkhill.com; bsusko@cgsh.com; dbuell@cgsh.com; jbromley@cgsh.com; soneal@cgsh.com; dgottlieb@cgsh.com; rlincer@cgsh.com; andrew.brozman@cliffordchance.com; sarah.campbell@cliffordchance.com: tserventi@cobasys.com: bceccotti@cwsny.com: goldberg@cwg11.com: skomrower@coleschotz.com; sfalanga@connellfoley.com; chemrick@connellfoley.com; pretekin@coollaw.com; belkys.escobar@loudoun.gov; mbaxter@cov.com; sjohnston@cov.com; jcarberry@cl-law.com; lisa.wurster@dana.com; donald.bernstein@dpw.com; gm@dmms.com; rmeth@daypitney.com; msteen@daypitney.com; rmeth@daypitney.com; msteen@daypitney.com; adoshi@daypitney.com; info@dealertire.com; jpowers@debevoise.com; rfhahn@debevoise.com; james.moore@dechert.com; juliet.sarkessian@dechert.com; shmuel.vasser@dechert.com; contact-ocfo@dol.gov; dmertz@state.pa.us; csweeney@dickinsonwright.com; dcopley@dickinsonwright.com; dyitzchaki@dickinsonwright.com; jplemmons2@dickinsonwright.com; kewald@dickinsonwright.com; mchammer3@dickinsonwright.com; gdiconza@dlawpc.com; karol.denniston@dlapiper.com; jennifer.nassiri@dlapiper.com; psykes@dow.com; kristin.going@dbr.com; stephanie.wickouski@dbr.com; kristin.going@dbr.com; ellen.j.kullman@usa.dupont.com; tim@leuliettepartners.com; mpartipilo@dmimail.com; ayala.hassell@hp.com; rhiersteiner@eapdlaw.com; jdarcey@eapdlaw.com; azuccarello@eapdlaw.com; jgroves@eapdlaw.com; cbodell@eapdlaw.com; jwhitlock@eapdlaw.com; george.sanderson@elliswinters.com; george.sanderson@elliswinters.com; akatz@entergy.com; deisenberg@ermanteicher.com; druhlandt@ermanteicher.com; eerman@ermanteicher.com; mkogan@ecjlaw.com; pjazayeri@ecjlaw.com; ngoteiner@fbm.com; rrross@fedex.com; ppascuzzi@ffwplaw.com; rhuey@foley.com; vavilaplana@foley.com; mriopelle@foley.com; auetz@foley.com; fdicastri@foley.com; jmurch@foley.com; jlee@foley.com; sbarbatano@foley.com; maiello@foley.com; sbarbatano@foley.com; shilfinger@foley.com; sbarbatano@foley.com; jsimon@foley.com; kcatanese@foley.com; sseabolt@foley.com; shilfinger@foley.com; fdicastri@foley.com; jsimon@foley.com; shilfinger@foley.com; jsimon@foley.com; kcatanese@foley.com; tspillane@foley.com; jsimon@foley.com; kcatanese@foley.com; klynch@formanlaw.com; fstevens@foxrothschild.com; gwallace@fraserlawfirm.com; ahammer@freebornpeters.com; tfawkes@freebornpeters.com; rgreenberg@dclawfirm.com; drosenzweig@fulbright.com; mhaut@fulbright.com; lboydston@fulbright.com; lstrubeck@fulbright.com; lboydston@fulbright.com; mparker@fulbright.com; drosenzweig@fulbright.com; jrabin@fulbright.com; dcrapo@gibbonslaw.com; dfeldman@gibsondunn.com; mjwilliams@gibsondunn.com; glenn.reisman@ge.com; jflaxer@golenbock.com; dfurth@golenbock.com; avassallo@golenbock.com; bmehlsack@gkllaw.com; drosner@goulstonstorrs.com; gkaden@goulstonstorrs.com; Kadish, Allen G. (Shld-NY-Bky); Salazar, Luis (Shld-Mia-Bky/Priv); jdivack@hahnhessen.com; hpatwardhan@hahnhessen.com; ldpowar@hahnlaw.com; dademarco@hahnlaw.com; cbattaglia@halperinlaw.net; jdyas@halperinlaw.net; info@harmanbecker.de; jaho@hselaw.com; wkreienberg@hselaw.com; jweider@hselaw.com; ipalermo@hselaw.com; jweider@hselaw.com; ipalermo@hselaw.com; kafricano@hselaw.com; rfink@hselaw.com; rfink@hselaw.com; jonathan.hook@haynesboone.com; patrick.hughes@haynesboone.com; peter.ruggero@haynesboone.com; charles.beckham@haynesboone.com; brooks.hamilton@haynesboone.com; judith.elkin@haynesboone.com; matthew.russell@haynesboone.com; bshort@hsblawfirm.com; sselbst@herrick.com; prubin@herrick.com; ecurrenti@hess.com; mike.nefkens@eds.com; ramona.neal@hp.com; linda.damico@hp.com; tcurran@haslaw.com; skatzoff@hblaw.com; skatzoff@hblaw.com; sagolden@hhlaw.com; bjgrieco@hhlaw.com;

```
jsgroi@honigman.com; rweiss@honigman.com; tsherick@honigman.com; elarson@hss-mms.com;
     irhunter@hunterschank.com; tomschank@hunterschank.com; jrsmith@hunton.com; ppartee@hunton.com;
           rnorton@hunton.com; sbernstein@hunton.com; anne.boudreau@ic.gc.ca; rgriffin@iuoe.org;
         memberservices@iuawfcu.com; nganatra@uaw.net; mneier@ibolaw.com; ilsaffer@ilsaffer.com;
           rkruger@jaffelaw.com; dmurray@jenner.com; ptrostle@jenner.com; jboyles@jhvgglaw.com;
     mam@johnstonbarton.com; takaya yamada@jtekt.co.jp; jeff.rich@klgates.com; eric.moser@klgates.com;
                 rsmolev@kayescholer.com; jstitt@kmklaw.com; twilson@kelley-ferraro.com;
  kdwbankruptcydepartment@kelleydrye.com; kdwbankruptcydepartment@kelleydrye.com; info@kemkrest.com;
 lmagarik@kjmlabor.com; sjennik@kjmlabor.com; tmurray@kjmlabor.com; pwh@krwlaw.com; jed@krwlaw.com;
   ecf@kaalaw.com; bcrowley@klehr.com; jwe@kjk.com; fberg@kotzsangster.com; jmacyda@kotzsangster.com;
    acaton@kramerlevin.com; gplotko@kramerlevin.com; tmayer@kramerlevin.com; arogoff@kramerlevin.com;
     rschmidt@kramerlevin.com; lmacksoud@kramerlevin.com; jsharret@kramerlevin.com; tah@kompc.com;
  dmb@kompc.com; psm@kompc.com; mws@kompc.com; abruski@lambertleser.com; scook@lambertleser.com;
  robert.rosenberg@lw.com; adam.goldberg@lw.com; gabriel.delvirginia@verizon.net; sheehan@txschoollaw.com;
larrykraines@gmail.com; michael.hastings@leclairryan.com; michael.conway@leclairryan.com; shepner@lrbpc.com;
 rbarbur@lrbpc.com; rstroup@lrbpc.com; dallas.bankruptcy@publicans.com; houston bankruptcy@publicans.com;
  austin.bankruptcy@publicans.com; kwalsh@lockelord.com; tmcfadden@lockelord.com; metkin@lowenstein.com;
        steele@lowenstein.com; ilevee@lowenstein.com; metkin@lowenstein.com; steele@lowenstein.com;
       ilevee@lowenstein.com; khk@maddinhauser.com; msl@maddinhauser.com; smatta@mattablair.com;
    dhartheimer@mazzeosong.com; kab@mccarthylebit.com; rrk@mccarthylebit.com; sveselka@mvbalaw.com;
       mreed@mvbalaw.com; dgoff@mvbalaw.com; janwoolley@mgwl.com; cdorkey@mckennalong.com;
       cgraham@mckennalong.com; jmayes@mckennalong.com; lamme@mltw.com; privitera@mltw.com;
elobello@msek.com; elobello@msek.com; hkolko@msek.com; msholmes@cowgillholmes.com; gillcr@michigan.gov;
         funds@michigan.gov; wcacinfo@michigan.gov; mbarr@milbank.com; tlomazow@milbank.com;
              skhalil@milbank.com; ecfsarbt@millerjohnson.com; ecfwolfordr@millerjohnson.com;
            hutchinson@millercanfield.com; robbins@millercanfield.com; fusco@millercanfield.com;
        swansonm@millercanfield.com; pricotta@mintz.com; sdnyecf@dor.mo.gov; nramsey@mmwr.com;
    joneil@mmwr.com; cynthialowery@myalaw.com; agottfried@morganlewis.com; rtoder@morganlewis.com;
hbeltzer@morganlewis.com; eliu@morganlewis.com; rmauceri@morganlewis.com; bankruptcy@morrisoncohen.com;
    igilbert@motleyrice.com; jrice@motleyrice.com; jbaden@motleyrice.com; lawrence.s.buonomo@gm.com;
     tstenger@alixpartners.com; cmcmanus@muchshelist.com; mkoks@munsch.com; rurbanik@munsch.com;
      rsox@dealerlawyer.com; nwbernstein@nwbllc.com; dbrody@borahgoldstein.com; gkelly@narmco.com;
     george.cauthen@nelsonmullins.com; linda.barr@nelsonmullins.com; cameron.currie@nelsonmullins.com;
          peter.haley@nelsonmullins.com; maureen.leary@oag.state.ny.us; susan.taylor@oag.state.ny.us;
         cmomjian@attorneygeneral.gov; info@andrewcuomo.com; lucas.ward@ohioattorneygeneral.gov;
 mjr1@westchestergov.com; michelle.sutter@ohioattorneygeneral.gov; rwyron@orrick.com; rfrankel@orrick.com;
  Imcgowen@orrick.com; aenglund@orrick.com; crogers@orrick.com; jansbro@orrick.com; crogers@orrick.com;
   email@orumroth.com; tsandler@osler.com; dwallen@oshr.com; jhelfat@oshr.com; ssoll@oshr.com; oshr-gm-
       bk@oshr.com; chipford@parkerpoe.com; mrichman@pattonboggs.com; msalzberg@pattonboggs.com;
           miachan@pattonboggs.com; arosenberg@paulweiss.com; harveystrickon@paulhastings.com;
    akornberg@paulweiss.com; ikoevary@paulweiss.com; akornberg@paulweiss.com; rzubaty@paulweiss.com;
    ipohl@paulweiss.com; arosenberg@paulweiss.com; bhermann@paulweiss.com; mphillips@paulweiss.com;
  sshimshak@paulweiss.com; pweintraub@paulweiss.com; maricco.michael@pbgc.gov; terry.miller@penske.com;
       toolee@pepperlaw.com; caseyl@pepperlaw.com; jaffeh@pepperlaw.com; carignanj@pepperlaw.com;
        kayesd@pepperlaw.com; kovskyd@pepperlaw.com; ebanda@pbfcm.com; joy.e.tanner@altria.com;
       richard.epling@pillsburylaw.com; erica.carrig@pillsburylaw.com; richard.epling@pillsburylaw.com;
             karen.dine@pillsburylaw.com; erica.carrig@pillsburylaw.com; tsadutto@platzerlaw.com;
         dlerner@plunkettcooney.com; dbernstein@plunkettcooney.com; mfleming@plunkettcooney.com;
            jsmairo@pbnlaw.com; rmschechter@pbnlaw.com; dbaldwin@potteranderson.com; tbrown-
edwards@potteranderson.com; rmcneill@potteranderson.com; bunch@ppg.com; sig@previant.com; fp@previant.com;
   rpatel@pronskepatel.com; srutsky@proskauer.com; aberkowitz@proskauer.com; faye.feinstein@quarles.com;
         christopher.combest@quarles.com; jrabinowitz@rltlawfirm.com; rrm narumanchi@hotmail.com;
    linda.galipeau@us.randstad.com; stingey@rqn.com; lee cooper@raytheon.com; eschaffer@reedsmith.com;
    kgwynne@reedsmith.com; cfelicetta@reidandriege.com; tlzabel@rhoadesmckee.com; rmallenski@aol.com;
   richardnotice@rwmaplc.com; mfriedman@rkollp.com; ksambur@rkollp.com; jshickich@riddellwilliams.com;
akress@riker.com; akress@riker.com; rkchevysales@rkautogroup.net; judith.adler@us.bosch.com; rsmith@cniinc.cc;
         rpm@robinsonbrog.com; aleffert@rwolaw.com; kstrickland@rmkb.com; cbelmonte@ssbb.com;
              pbosswick@ssbb.com; aisenberg@saul.com; jhampton@saul.com; tcurrier@saul.com;
 rheilman@schaferandweiner.com; glee@schaferandweiner.com; bbressler@schnader.com; aadams@schnader.com;
         rbarkasy@schnader.com; mbarrie@schnader.com; bdeutsch@schnader.com; david.karp@srz.com;
          adam.harris@srz.com; mschonfeld@gibsondunn.com; dlin@seyburn.com; lstein@seyburn.com;
 bshaw100@shawgussis.com; fsosnick@shearman.com; jfrizzley@shearman.com; etillinghast@sheppardmullin.com;
```

mcademartori@sheppardmullin.com; bwolfe@sheppardmullin.com; achaykin@shinnfuamerica.com; scotts@shivelybros.com; kkansa@sidlev.com; avery@silvermanmorris.com; arosen@silvermanacampora.com; dmack@stblaw.com; ppantaleo@stblaw.com; levick@singerlevick.com; mshriro@singerlevick.com; kayalyn.marafioti@skadden.com; jack.butler@skadden.com; nboehler@cbmlaw.com; cmeyer@ssd.com; tcornell@stahlcowen.com; ccaldwell@starkreagan.com; wpayne@stemberfeinstein.com; edoyle@stemberfeinstein.com; jstember@stemberfeinstein.com; efeinstein@stemberfeinstein.com; shgross5@yahoo.com; cbullock@sbplclaw.com; sgoll@sbplclaw.com; nashvillebankruptcyfilings@stites.com; bmeldrum@stites.com; streusand@streusandlandon.com; lbrimer@stroblpc.com; esserman@sbep-law.com; hartwick@sbep-law.com; d'apice@sbep-law.com; newton@sbep-law.com; klewis@tblawllp.com; jteitelbaum@tblawllp.com; marvin.clements@ag.tn.gov; lischen@tcwtgn.com; kenneth freda@gardencitygroup.com; casey.roy@oag.state.tx.us; dkowich@umich.edu; rbrownlee@thompsoncoburn.com; jesse@tipotexchevrolet.com; abauer@torys.com; tmartin@torys.com; sdellafera@trenklawfirm.com; brett.goodman@troutmansanders.com; jeffrey.kelley@troutmansanders.com; paula.christ@trw.com; joseph.samarias@do.treas.gov; mkilgore@up.com; david.jones6@usdoj.gov; jeffrey.oestericher@usdoj.gov; matthew.schwartz@usdoj.gov; joseph.cordaro@usdoj.gov; antitrust.atr@usdoi.gov; askdoi@usdoi.gov; diury@usw.org; andv.smith@valeo.com; françoise.colpron@valeo.com; mjedelman@vedderprice.com; mjedelman@vedderprice.com; mschein@vedderprice.com; ezavalkoffbabej@vedderprice.com; lakatz@venable.com; roran@velaw.com; harry.nieman@voith.com; tscobb@vorys.com; gtoering@wnj.com; crusemg@wnj.com; sgrow@wnj.com; rbarrows@wdblaw.com; rbarrows800@gmail.com; harvey.miller@weil.com; joseph.smolinsky@weil.com; stephen.karotkin@weil.com; karpek@whiteandwilliams.com; dockterman@wildman.com; young@wildman.com; friedman@wildman.com; dpacheco@wilentz.com; laccarrino@wilentz.com; uncbill@msn.com; dennis.jenkins@wilmerhale.com; philip.anker@wilmerhale.com; melanie.dritz@wilmerhale.com; cschreiber@winston.com; djrichardson@winston.com; mbotica@winston.com; mcohn@winston.com; sschwartz@winston.com; wdcoffeylaw@yahoo.com; swolfson@wolfsonbolton.com; jwyly@wylyrommel.com; skrause@zeklaw.com; bleinbach@zeklaw.com; mbeatman@zeislaw.com; jverillo@zeislaw.com